

April 20, 2006

Adrienne L. Kiley
RegNet Environmental Services
Troy Chemical Company
8 Vreeland Road
P.O. Box 955
Florham Park, NJ 07932

Dear Ms. Kiley:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for 2-benzimidazolecarbamic acid, methyl ester, posted on the ChemRTK HPV Challenge Program Web site on February 23, 2005. I commend Troy Chemical Company for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA will post this letter and the enclosed comments on the HPV Challenge Web site within the next few days. As noted in the comments, we ask that Troy Chemical advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact Mark Townsend, Chief of the HPV Chemicals Branch, at 202-564-8617. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

/s/

Oscar Hernandez, Director
Risk Assessment Division

Enclosure

cc: W. Penberthy
J. Willis

**EPA Comments on Chemical RTK HPV Challenge Submission:
2-Benzimidazolecarbamic Acid, Methyl Ester**

Summary of EPA Comments

The sponsor, Troy Chemical Company, submitted robust summaries to EPA for 2-benzimidazolecarbamic acid, methyl ester (CAS No. 10605-21-7) dated January 11, 2005. EPA posted the submission on the ChemRTK HPV Challenge Web site on February 23, 2005.

EPA has reviewed this submission and has reached the following conclusions:

1. General. The submitter needs to include a test plan in this submission such as a one-page summary table of existing data, data gaps, and what testing is or is not proposed.
2. Physicochemical Properties. The submitted data are adequate for the purposes of the HPV Challenge Program. The submitter needs add information to the boiling point robust summary.
3. Environmental Fate. The submitted data are adequate for the purposes of the HPV Challenge Program except for photodegradation. The submitter needs to add an indirect photodegradation estimate to the robust summary.
4. Health Effects. The submitted data are adequate for the purposes of the HPV Challenge Program.
5. Ecological Effects. The submitted data are adequate for the purposes of the HPV Challenge Program.

EPA requests that the submitter advise the Agency within 60 days of any modifications to its submission.

**EPA Comments on the 2-Benzimidazolecarbamic Acid, Methyl Ester
Challenge Submission**

Test Plan

Physicochemical Properties (melting point, boiling point, vapor pressure, water solubility, and partition coefficient)

The submitted data for all endpoints are adequate for the purposes of the HPV Challenge Program.

Boiling point. The criterion stated by the submitter (i.e., required only if the chemical is a liquid at room temperature) does not apply in the HPV Challenge Program; the HPV guidelines state that a boiling point above 300 °C need not be specified. EPA estimates a boiling point of 404 °C, indicating that no testing is necessary. The submitter needs to address the appropriate criterion in the robust summary and also add that this chemical decomposes between 75 and 314 °C, as mentioned in the melting point summary.

Environmental Fate (photodegradation, stability in water, biodegradation, and fugacity)

The submitted data for all endpoints are adequate for the purposes of the HPV Challenge Program except for photodegradation.

Photodegradation. The submitter should provide an indirect photodegradation estimate. Even though the compound does not have a high vapor pressure, it may volatilize from water because it has a low water solubility. The submitter needs to add to the robust summary information from AOPWIN on the

reaction of this chemical with hydroxyl radicals or ozone in the atmosphere.

Health Effects (acute toxicity, repeated-dose toxicity, genetic toxicity, and reproductive/developmental toxicity)

The submitted data are adequate for the purposes of the HPV Challenge Program

Ecological Effects (fish, invertebrates, and algae)

The submitted data for these endpoints are adequate for the purposes of the HPV Challenge Program.

Specific Comments on the Robust Summaries

None.

Followup Activity

EPA requests that the submitter advise the Agency within 60 days of any modifications to its submission.